

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

UNITED STATES' MOTION TO WITHDRAW MOTION FOR COSTS

The United States hereby moves to withdraw its pending Motion for Costs, Dkt. 100. On May 28, 2021, the United States filed a motion seeking recuperation of damages sustained by the government as a result of Defendants' noncompliance with the Court's January 15, 2021 and March 22, 2021 Orders. *See* Dkt. 100. On December 23, 2021, the Court approved and entered a Consent Decree between the United States and the Lowes resolving the claims raised against the Lowes in this action. Dkt. 156. In the Consent Decree, the United States and the Lowes agreed that the United States would withdraw its Motion for Costs within seven days of the Court's entry of the Consent Decree. Dkt. 155 at 7. The Court issued an Order on December 23, 2021, approving the Consent Decree and ordering the United States to file a motion to withdraw its pending motion for damages by January 6, 2021. Dkt. 156.

In accordance with the Consent Decree and the Court's Order of December 23, 2021, the United States respectfully moves to withdraw its pending Motion for Costs.

DATED: December 29, 2021

Respectfully Submitted,

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division

/s/ Devon Lea Flanagan
DEVON LEA FLANAGAN
Trial Attorney
BRIENA STRIPPOLI
Trial Attorney
MARY HOLLINGSWORTH
Senior Trial Attorney
United States Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
Briena.Strippoli@usdoj.gov | 202-598-0412
Mary.Hollingsworth@usdoj.gov | 202-598-1043
Devon.Flanagan@usdoj.gov | 202-305-0201
Fax: 202-305-0275

CHRISTOPHER J. WILSON
Acting United States Attorney
SUSAN BRANDON, Civil Chief
United States Attorney's Office
Eastern District of Oklahoma
520 Denison Avenue
Muskogee, OK 74401

Attorneys for the United States of America